

CIVIL ACTION NO.: 3:14-cv-102

REPORT ON RULE 26(f) CONFERENCE

- a. Discovery will be needed on the following subjects: relevant non-privileged information, testimony, documents related to the allegations and claims advanced by Plaintiffs and allegations, denials and defenses of the Defendant.
- b. The parties have discussed how to handle discovery of electronically stored information and continue to negotiate the format of that discovery and of any protective order needed, and will have an agreement in place with respect to such prior to the date by which responses to discovery requesting production of electronically stored information is due.
- c. The parties have discussed how to handle production of privileged or confidential information and continue to negotiate the format of any protective order needed, and will have an agreement in place with respect

to such prior to the date by which responses to discovery requesting production of privileged or confidential information is due.

- d. All discovery commenced in time to be completed by December 1, 2014.
- e. Maximum of 25 interrogatories by Defendant to each Plaintiff.
- f. Maximum of 25 interrogatories by each Plaintiff to Defendant.
- g. Maximum of 25 requests for admissions by Defendant to each Plaintiff.
- h. Maximum of 25 requests for admissions by each Plaintiff to each Defendant.
- i. The number of discovery depositions will be limited to eight depositions for each party. The parties stipulate that depositions will be limited in length to eight hours.
- j. Reports from retained experts under Rule 26(a)(2) due from Plaintiff by August 31, 2014, and from Defendant by September 30, 2014.
- k. The parties have discussed conducting mediation toward the end of the discovery period, and will agree upon a mediator and exact date for mediation closer to that time.

4. **Other items.**

- a. The parties do not request a conference with the court before the entry of the scheduling order.
- b. The parties request a pretrial conference in January, 2015.
- c. Plaintiff should be allowed until May 31, 2014 to join additional parties and to amend the pleadings.
- d. Defendant should be allowed until June 15, 2014 to join additional parties and to amend the pleadings.
- e. All potentially dispositive motions should be filed by December 14, 2014.
- f. The parties have discussed settlement of this matter, and at this time, the prospect of settlement is unknown.
- g. At least 30 days before the final pretrial conference, the parties shall exchange final list of witnesses and exhibits under Rule 26(a)(3).

- h. Fifteen days before the pretrial conference, any party may designate and serve any objections to such disclosures of witnesses and exhibits.
- i. The parties have discussed special procedures for managing the case, including referral to a Magistrate Judge, and do not consent to the referral of the case to a Magistrate Judge.
- j. The case should be ready for trial by March 14, 2015 and at this time is expected to take approximately 3 days.

Respectfully submitted, April 14, 2014

/s/ Mitchel E. Luxenburg

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Case 3:14-cv-00102-GCM Document 8 Filed 04/15/14 Page 4 of 4